

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

.....November 21..... 2007
BRUCE RIFKIN, Clerk
By Joshua J. Thomas Deputy

07-CR-05732-INDI

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE *TACOMA*

UNITED STATES OF AMERICA,

Plaintiff,

v.

WELDON MARC GILBERT,

Defendant.

NO. **CR07 5732 BHS**

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Sexual Exploitation of a Child in the Production of Child Pornography)

Beginning on a date unknown, but in or about 2001, and continuing until on or about October 31, 2007, within the Western District of Washington and elsewhere, the defendant, WELDON MARC GILBERT, did knowingly and intentionally use, persuade, induce, entice, and coerce a minor male, John Doe 1, who at the time was under the age of eighteen (18) years, to engage in sexually explicit conduct, specifically, sexual spanking, mutual masturbation, oral-genital sexual intercourse, and the lascivious exhibition of the genitals and pubic area of said minor male, for the purpose of producing visual depictions of such conduct, that is, videotapes and digital video discs (DVDs), such

INDICTMENT/GILBERT - 1

1 visual depictions having been produced using materials that had been mailed, shipped,
2 and transported in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

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5 **COUNT TWO**
(Sexual Exploitation of a Child in the Production of Child Pornography)

6 Beginning on a date unknown, but in or about 2001, and continuing until on or
7 about October 31, 2007, within the Western District of Washington and elsewhere, the
8 defendant, WELDON MARC GILBERT, did knowingly and intentionally use, persuade,
9 induce, entice, and coerce a minor male, John Doe 2, who at the time was under the age
10 of eighteen (18) years, to engage in sexually explicit conduct, specifically, sexual
11 spanking, mutual masturbation, oral-genital sexual intercourse, and the lascivious
12 exhibition of the genitals and pubic area of said minor male, for the purpose of producing
13 visual depictions of such conduct, that is, videotapes and digital video discs (DVDs), such
14 visual depictions having been produced using materials that had been mailed, shipped,
15 and transported in interstate and foreign commerce.

16 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

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18 **COUNT THREE**
(Sexual Exploitation of a Child in the Production of Child Pornography)

19 Beginning on a date unknown, but in or about 2001, and continuing until on or
20 about October 31, 2007, within the Western District of Washington and elsewhere, the
21 defendant, WELDON MARC GILBERT, did knowingly and intentionally use, persuade,
22 induce, entice, and coerce a minor male, John Doe 3, who at the time was under the age
23 of eighteen (18) years, to engage in sexually explicit conduct, specifically, sexual
24 spanking, mutual masturbation, oral-genital sexual intercourse, and the lascivious
25 exhibition of the genitals and pubic area of said minor male, for the purpose of producing
26 visual depictions of such conduct, that is, videotapes and digital video discs (DVDs), such
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INDICTMENT/GILBERT - 2

1 visual depictions having been produced using materials that had been mailed, shipped,
2 and transported in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

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5 **COUNT FOUR**
6 **(Transportation of a Minor to Engage in Illegal Sexual Activity)**

7 In or about 2005, within the Western District of Washington and elsewhere, the
8 defendant, WELDON MARC GILBERT, did knowingly and willfully transport and
9 caused to be transported a minor male, John Doe 1, who at the time was under the age of
10 eighteen (18) years, in interstate and foreign commerce from Pierce County, in the State
11 of Washington, to Canada, with the intent that the minor male engage in sexual activity
12 under circumstances as would constitute a criminal offense by a person under Revised
13 Code of Washington (RCW) Section 9A.44.089, Child Molestation; RCW Section
14 9.68A.090, Communication with a Minor for Immoral Purposes; RCW Section
15 9.68A.040, Sexual Exploitation of a Minor; RCW Section 9A.44.093,

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1 Sexual Misconduct with a Minor in the First Degree; RCW Section 9A.44.096, Sexual
2 Misconduct with a Minor in the Second Degree; and Title 18, United States Code,
3 Section 2251(a), Sexual Exploitation of a Child in the Production of Child Pornography.

4 All in violation of Title 18, United States Code, Section 2423(a) and Section 2.


5 A TRUE BILL:

6 DATED: 11/21/07

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8 *The signature of the foreperson has been*
9 *redacted pursuant to the policy of the Judicial*
10 *Conference of the United States*

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FOREPERSON

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13 JEFFREY C. SULLIVAN
14 United States Attorney

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16 LAWRENCE LINCOLN
17 Assistant United States Attorney

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19 ROGER ROGOFF
20 Assistant United States Attorney

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INDICTMENT/GILBERT - 4